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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates To:

ALL ACTIONS

Case No. 3:23-md-03084-CRB

**DECLARATION OF WILLIAM ANDERSON
IN SUPPORT OF DEFENDANTS' STATEMENT
IN SUPPORT OF PLAINTIFFS'
ADMINISTRATIVE MOTION TO CONSIDER
WHETHER ANOTHER PARTY'S MATERIAL
SHOULD BE SEALED**

Judge: Hon. Charles R. Breyer
Courtroom: 6 – 17th Floor

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DECLARATION OF WILLIAM ANDERSON

I, William Anderson, declare pursuant to 28 U.S.C. § 1746:

1. I am over the age of 18 and a resident of Denver, CO. I respectfully submit this declaration in support of Defendants Uber Technologies, Inc.'s, Rasier, LLC's, and Rasier-CA, LLC's, (collectively, "Uber's") Statement In Support of Plaintiffs' Administrative Motion to Consider Whether Another Party's Material Should Be Sealed.

2. I am presently employed by Uber Technologies, Inc. as Sr. eDiscovery Analyst II. I have been employed by Uber since 2016. In my role, I am familiar with Uber's various platforms and internal data management tools. I am familiar with the statements made in this declaration and, if called as a witness, I could and would competently and truthfully testify thereto.

3. I have reviewed the material at 3:16–4:7 of Plaintiffs' Brief in Support of Proposed Defendant Fact Sheet. This material describes an internal data management tool that Uber uses in connection with its business.

4. Uber treats the name of and its capabilities with this internal data management tool as confidential.

5. If this private, commercially sensitive, and proprietary business information were to be released to the public, Uber's competitors and potential business partners would gain insight into Uber's internal business operations, potentially compromising Uber's competitive standing. This harm could occur in several ways, including by enabling competitors to replicate Uber's data management tool and practices without dedicating the time and resources necessary to develop their own business operations.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on February 6, 2024.

DocuSigned by:
William Anderson
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William Anderson